EPA/ROD/R-05-00/0903

EPA Superfund
Record of Decision:

NUTTING TRUCK AND CASTER COMPANY
EPA ID: MND006154017
OU 00
FARIBAULT, RICE COUNTY, MN
09/03/2010

U.S. EPA SUPERFUND

RECORD OF DECISION

NUTTING TRUCK AND CASTER SUPERFUND SITE

RICE COUNTY, MINNESOTA

SEPTEMBER 2010

TABLE OF CONTENTS

RECORD OF DECISION
SELECTED REMEDIAL ALTERNATIVE

DECLARATION

SITE NAME AND LOCATION

Nutting Truck and Caster Superfund Site (Nutting Truck and Caster) MND006154017; City of Faribault. Rice County, Minnesota.

STATEMENT OF BASIS AND PURPOSE

The decision document presents the selected remedy at the Nutting Truck and Caster, located in the city of Faribault, Rice County, Minnesota. The remedy was chosen in accordance with the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and, to the extent practicable with the National Oil and Hazardous Substance Contingency Plan (NCP). This decision is based on information contained in the Administrative Record for the Nutting Truck and Caster Superfund Site. The Minnesota Pollution Control Agency concurs with the selected remedy.

ASSESSMENT OF THE SITE

The lead agency has determined that no further action is necessary to protect public health or welfare or the environment.

DESCRIPTION OF THE SELECTED REMEDY

U.S. EPA has determined that no CERCLA remedial action is necessary for Nutting Truck and Caster.

STATUTORY DETERMINATIONS

U.S. EPA has determined that no CERCLA remedial action is necessary for Nutting Truck and Caster. Contaminated soils from an on-site disposal pit at the Nutting Site property were excavated and disposed off-site. The disposal pit was filled with clean soil meeting residential clean-up levels, and covered by a concrete parking surface. This action eliminated the principal threat and the possibility of 1) precipitation to enable the contaminants to migrate through the soil into the groundwater, and 2) access to the former seepage pit area by potential receptors. Groundwater extraction wells were installed and operated for more than 15 years to control and removed contaminated groundwater. No contaminants of concern were ever detected in the

compliance monitoring wells downgradient of the Nutting Site. Long term monitoring since the extraction wells were shut down has shown that groundwater contamination has decreased to non-detection in the plume and at compliance monitoring points. All monitoring and extraction wells have been properly abandoned. These remedial actions afford long-term protection of human health and the environment.

for Richard C. Karl, Director
Superfund Division

Date 9/3/10

SUMMARY OF REMEDIAL ALTERNATIVES DECISION
NUTTING TRUCK AND CASTER SITE
FARIBAULT, RICE COUNTY MINNESOTA

I. SITE NAME, LOCATION AND DESCRIPTION

The Nutting Truck and Caster Company ("Nutting" or "Nutting Company") is located at 1221 Division Street in the city of Faribault, Rice County, Minnesota. The Nutting Site (the "Site") property consists of 8.6 acres and is bounded on the west by Prairie Avenue and on the southeast by railroad tracks. The north property line is approximately 250 feet south of Division Street (see Figures 1 and 2) and is accessed via Prairie Avenue. In 1984, the property owners, Stewart and Shirley Shaft, sold the Nutting manufacturing operation to Faultless. The operation was relocated to Watertown, South Dakota as the Faultless Nutting Division of a larger corporate entity. The Shafts reconstituted their business as the Prairie Avenue Leasing Company, which currently occupies the 8.6-acre Site property.

Land surrounding the Site consists of mixed low and medium-density residential, commercial, and light industrial use. The current Site property is leased for commercial and light industrial purposes. The current occupants of the property include an active manufacturing facility and warehouse and welding shop. A vacant former foundry building sits in the northeast corner of the property. The downgradient area between the northern Site boundary and Division Street are occupied by two private residences, office buildings and a self-storage facility. All properties adjacent to and downgradient of the Site are connected to the Faribault municipal drinking water supply. At the present time, there are no known planned land use changes for this Site or any surrounding properties.

Past operations at the Nutting Truck and Caster Company led to the release of contaminated substances to the soil and shallow groundwater. It was due to this release of contaminants that the Site was listed on the National Priorities List (NPL) on September 8, 1983. The state listed the Site on its Permanent List of Priorities (PLP) in October 1984.

II. SITE HISTORY AND ENFORCEMENT ACTIVITIES

From 1891 through 1984, the Nutting Company manufactured and distributed casters, wheels, hand trucks and towline trucks at its Faribault facility. A surface depression was located on the south side of the manufacturing building. Prior to 1979, foundry and other wastes were deposited in the surface depression, which was an abandoned gravel pit. In 1959 the company began using a seepage pit in the west central area of the Site and the northwest corner of the surface depression to deposit waste and sludges including waste solvents. These solvents belong to a class of chemicals commonly known as Volatile Organic Compounds (VOCs) that were used

as metal degreasers during the manufacturing process. The major VOCs detected were trichloroethylene (TCE) and 1,2-dichloroethylene (1,2-DCE). The seepage pit covered an area of approximately 3,200 square feet and was about 13 feet deep. The upper three to four feet of the seepage pit consisted of sludge material.

Beginning in the late 1970's, the Nutting Site contamination was addressed under state environmental law. The Minnesota Pollution Control Agency (MPCA) issued a Notice of Noncompliance ("Notice") to the Nutting Company in 1979 for its past disposal practices. In response to the Notice, the Nutting Company performed a Remedial Investigation (RI) to determine the nature and extent of contamination in the soil in and around the Site. As a result of the soil contamination found during the RI, Nutting excavated the materials and contaminated soils from the former seepage pit, backfilled the excavation with clean soil, and capped the area with concrete in 1980. The contaminated soils were disposed of at an off-site facility.

In October and November 1982, all five of the Faribault municipal wells showed contamination by VOCs, chiefly trichloroethylene (TCE) and 1,2-dichloroethylene (1,2-DCE).

Eventually, the Site was subject to actions under the Minnesota Environmental Response and Liability Act (MERLA) of 1983. MERLA was enacted to investigate and clean up releases of hazardous substances, pollutants or contaminants. MERLA requires the MPCA to establish a state superfund priority list, known as the Permanent List of Priorities (PLP) among sites involving the release or threatened release of hazardous substances, pollutants, or contaminants, and to update this priority list as needed. This authority [Minn. Stat. § 115B.17, subd. 13 (2008), and Minn. R. ch. 7044 (2006)] was the basis for later remedial activities at the Site under the authority of MPCA.[1]

The MPCA issued a Request for Response Action (RFRA) to Nutting on September 22, 1983, and a Response Order by Consent ("Consent Order" or "Order") on April 26, 1984. The Order required the company to conduct another RI for the groundwater to determine if a remedial action (RA) was necessary.

Additional RIs were conducted in 1984, 1985, and 1986. The investigations showed that the shallower or upper alluvial aquifer is comprised of glacial outwash underlain by sandstone. A deeper dolomite aquifer underlies the sandstone, and is used as the regional drinking water aquifer. The hydraulic gradient of these aquifers is to the north of the Site (downgradient) with a slight upward gradient between the deeper dolomite drinking water aquifer and the upper aquifer.

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[1] Under this authority, the MPCA has administered the Enforcement Deferral Pilot project at the Nutting Site since October 1, 1994. The pilot project was meant to demonstrate full accountability for state enforcement lead Superfund sites without federal oversight or intervention.

The investigations also showed that the pit area was found not to be the cause of the groundwater contamination at the Faribault well field. As a result of this finding, the Faribault well field was added to the PLP as a separate state superfund site. The MPCA addressed the Faribault groundwater contamination by funding the installation of a new well and abandoned the old well. Further, the MPCA concluded that a RA and feasibility study was not needed since the identified source of contamination, i.e., the seepage pit soils, had been removed and disposed of in 1980.

MPCA issued a second RFRA directing Nutting to develop and implement a Response Action Plan (RAP) for groundwater remediation. Nutting submitted the RAP in February 1987, which called for extraction and treatment of contaminated groundwater with continued groundwater monitoring. MPCA issued a second Order to Nutting in September 1987 requiring Nutting to pump out contaminated groundwater until a concentration of 50 micrograms-per-liter (ug/l) or parts-per-billion (ppb) of TCE was consistently achieved in the upper aquifer at the Nutting property boundary. U.S. EPA was not a signatory to the Order.

In response to the Order, the Nutting Company installed and began operating a groundwater extraction and treatment (pump-and-treat) system in 1987. The extracted groundwater was treated using a gravity cascade system. This system maximized the contact of VOCs with air in order to strip the contaminants from the groundwater. The treated groundwater was then discharged to Crocker's Creek via the municipal storm sewer, located about 1,700 feet northwest of the Site. The discharged groundwater was required to meet standards under the National Pollution Discharge Elimination System in order to ensure that the creek surface water quality did not become degraded by the discharges.

III. COMMUNITY PARTICIPATION

U.S. EPA has accomplished public participation as required by Section 113(k)(2)(B)(I-v) of CERCLA, as amended by SARA, by:

- Establishing a Site information repository at the U. S. EPA Region 5 office in Chicago, Illinois. A Site information repository is also located at the Minnesota Pollution Control Agency, St. Paul, Minnesota;

- Updating the Site administrative records at the U. S. EPA Region 5 office in Chicago, Illinois and at the Minnesota Pollution Control Agency, St. Paul, Minnesota to include the proposed plan for this Record of Decision (ROD) and other documents relied upon for this ROD;

- Placing a formal advertisement in the local paper, *Faribault News*, on July 20, 2010 announcing the commencement of the public comment period, the opportunity to review

the proposed plan, and the availability of a public meeting if requested. This information was also posted on U.S. EPA's website on July 14, 2010;

- Mailing a proposed plan fact sheet, which contained the details about the Site, the proposed remedy and the availability of a public meeting, if requested, to the addressees on the mailing list;

- Releasing the proposed plan for public comment on July 13, 2010;

- Providing a 30-day public comment period which ended on August 15, 2010;

- Offering a hearing for U.S. EPA to present the proposed plan to the community; no hearing was requested;

- Accepting written comments regarding the proposed plan for the ROD; no comments were received by U.S. EPA.

The ROD will become part of the administrative record pursuant to the National Oil and Hazardous Substances Contingency Plan (NCP) at 40 C.F.R. 300.825(a)(2). The two locations of the administrative record for the Nutting Truck and Caster Site are listed below.

U. S. EPA Region 5
Records Center, 7th Floor
77 West Jackson Boulevard
Chicago, Illinois 60604

Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155

IV. SCOPE AND ROLE OF RESPONSE ACTION

Current Response Action

This ROD presents U.S. EPA's final response action for the Nutting Truck and Caster Site, which is No Further Action. The principal threat from the seepage pit soil contamination has been removed by excavating the soil, backfilling with clean soil, and capping the area. The groundwater RA operated from 1987 to 2004 and has demonstrated to have effectively removed the contaminants from the groundwater. No risks to human health or the environment currently exist at the Nutting Site. The Site conditions allow for unlimited use and unrestricted exposure, hence, no future Five-Year Reviews are required at the Nutting Site.

Previous Response Actions

Contamination found onsite affected both the soil and groundwater. Each of the contaminated media was addressed by their respective operable units (OUs).

OU I - Soil

The primary soil contamination was found at the seepage pit where the average concentration of TCE was 0.44 milligrams per kilogram (mg/kg) or parts-per-million (ppm) and the average concentration of methylene chloride, another VOC, in the seepage pit sludge was 456 ppm. The sludge also contained heavy metals such as cadmium, chromium and lead. The soil and seepage pit provided a continual source of groundwater contamination. Human health risks were posed by direct contact with the soil, and inhalation of the soil contaminants resulting from direct contact.

The Nutting Company completed the cleanup under OU1 in 1980 in response to the Notice of Noncompliance issued by the state. The contaminated soils and sludge from the on-site seepage pit at the west central area of the property were excavated and replaced with clean fill. The area was subsequently paved with concrete and is currently used as a loading dock and parking area. These actions eliminated the possibility of 1) precipitation enabling the contaminants to migrate through the soil, and 2) access to the former seepage pit area by potential receptors. The contamination found in the soils associated with the seepage pit was replaced with soil meeting residential clean-up levels; hence, this portion of the remedy provides long-term protection from contaminants leaching to the aquifer and from human health exposure to any cadmium, chromium, lead and residual TCE in the source area. Because the actions taken at OU1 removed the principal threat waste (i.e., source contaminants that are highly toxic and/or highly mobile) and thus the potential for risks to human health and the environment, the RA meets U.S. EPA's clean-up standards. Accordingly, U.S. EPA recommends that No Further Action be required at OU1.

OU II – Groundwater

TCE was the major contaminant of concern found in the groundwater at the Site. The sampling data collected during the RI found TCE levels as high as 570 ug/l or ppb in shallow groundwater downgradient of the former seepage pit. The levels exceeded the RAP clean-up standard of 50 ppb required by the Order. TCE was consistently detected at concentrations less than 35 ppb in samples from one drinking water monitoring well located onsite and immediately downgradient of the former seepage pit location. Human health risks were posed by the potential contamination of potable water supplies, which would create exposures via ingestion, inhalation and direct contact risks.

The Minnesota Department of Health (MDH), as the agency responsible for setting and enforcing safe drinking water, used Recommended Allowable Limits (RALs) as conservative advisory

levels to predict potential adverse effects that may result from contaminated drinking water. The RAL for TCE was set at 30 ppb based on its ability to increase the risk of cancer.[2] At that time, the RAL for TCE was being exceeded by the groundwater samples collected and was the basis for taking action.[3]

The city of Faribault's municipal water supply was also contaminated with trace levels of TCE and its breakdown products. Since one of the municipal wells was downgradient of the Nutting Site, the Site was identified as a potential source of the contamination of the municipal supply. After further investigations of other sources affecting the municipal supply were carried out, MPCA and the MDH concluded that the source of TCE contamination in the municipal well was not from the Nutting Site.

The remedy selected for OU2 involving groundwater is documented in the 1987 RAP. The Nutting Company installed a groundwater pump-and-treat system to prevent the migration of contaminated groundwater from the Site. This was to ensure protection of the downgradient aquifers for future use as a potable water supply. The RAP clean-up level of 50 ppb set for TCE in the upper aquifer units ensured that the downgradient drinking water aquifer would be protected; hence, the TCE levels in groundwater could not exceed 50 ppb in the compliance wells. These wells were the closest wells, i.e., 350-400 feet downgradient of the Nutting property boundary (see Figure 3). Several of the sentinel wells located on private properties were permanently sealed due to requests from property owners.

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[2] The TCE levels in groundwater posed risks from exposure to drinking water that exceeded EPA's acceptable excess lifetime cancer risk limits. For carcinogens, risks are generally expressed as the incremental probability of a person developing cancer over a lifetime because of exposure to the carcinogen. An excess lifetime cancer risk indicates that an individual experiencing the reasonable maximum exposure estimate has a 1 in 1,000,000 (one-in-one-million) chance of developing cancer because of site-related exposure. This is referred to as an "excess lifetime cancer risk" because it would be in addition to the cancer risk individuals face from other causes. U.S. EPA's defines the acceptable cancer risk as ranging from one-in-one-million at the low end, to one-in-ten-thousand at the high end.

[3] The MDH Health Risk Limits (HRLs) for TCE and other volatile organic contaminants were set in the early 1990s, after the 1987 RAP clean-up standard of 50 ppb was set. The MDH did, however, use RALs as available advisory levels that were before the HRL rules. The RALs were used to predict adverse effects that may result from contaminated drinking water and were derived through conservative risk assessment methods. The RAL for TCE was set at 30 ppb based on its ability to increase the risk of cancer. At that time, the RAL for TCE was being exceeded by the groundwater samples.

In January 2002, the MDH recommended that the Health Risk Limit (HRL)[4] for TCE be changed from 30 ppb to five ppb. This value coincides with U.S. EPA's Maximum Contaminant Level (MCL) for TCE under the Safe Drinking Water Act. The MCL is the concentration of TCE in water determined to be safe for daily human consumption over a lifetime based on cancer and noncancer health risks to humans; the level is then modified by the costs of detecting and removing the contaminant. The HRL is arrived at similarly, but is purely based on health effects and does not factor in feasibility as does the MCL.

In July 2003, Nutting amended the RAP to modify groundwater clean-up standard for the Nutting Site from 50 ppb of TCE to the present MCL/HRL action level of five ppb. MPCA issued a Final Close Out Report on July 25, 2003 indicating that the clean-up standards stated in the amended RAP had been achieved. The concentrations of TCE and 1,2-DCE in samples collected from the compliance wells have been five ppb or less since 1992. Monitoring and compliance well samples for TCE have shown that the TCE clean-up standard has been achieved in groundwater within the original plume area and downgradient of the Site.

V. SITE CHARACTERISTICS

The RI investigations showed that the upper aquifer is comprised of glacial outwash that is underlain by sandstone. Together these units comprise the shallower or upper alluvial aquifer. The base of the upper sandstone is largely shale. Beneath the upper aquifer is the Prairie du Chien sandstone dolomite aquifer. Water level measurements during the RI indicate that the lower sandstone allows for a slight upward migration of groundwater between the Prairie du Chien Aquifer and the upper aquifer. The Prairie du Chien dolomite underlies the sandstone and comprises the lower Prairie du Chien Aquifer, which is used as the drinking water aquifer. The lateral hydraulic gradient in the upper aquifer and in the Prairie du Chien aquifer is to the north of the Site (downgradient).

The investigations did not indicate the presence of Dense Nonaqueous Phase Liquids in the lower aquifer. The TCE concentrations in the sentinel wells installed in the upper alluvial aquifers and the drinking water aquifer had rarely exceeded one ppb for TCE since the wells were installed in mid-1980 during the RI. This indicated that the plume containment system was effective. In June 2004, a Revised Long Term Monitoring Plan outlined the criteria for shutting down the groundwater pump-and-treat system at the Nutting property, as well a contingency plan for restarting the system if warranted. The plan also revised the groundwater sampling frequency

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[4] The HRLs have since replaced the RALs and are calculated using the same methodology as for the RALs; hence, the HRL for TCE was also set at 30 ppb, later changed to five ppb. The MPCA policy is to utilize the HRL criteria and possible risk to human receptors to determine best management practices and action levels appropriate for each site.

from annual to semi-annual in order to provide increased monitoring data during the initial closure period of the groundwater pump-and-treat system. The plan also reassigned wells in the monitoring network so that the compliance wells were now 900 feet downgradient of the Nutting Site boundary. This increased distance to the compliance wells was acceptable because all previous private well users in the area began using the Faribault municipal water supply as their source for drinking water. Further, the Faribault municipal well that had been contaminated, had been removed from service.

The additional data showed that treatment system had effectively captured and treated TCE-contaminated groundwater since the time it began operating in1987 until it was shut down in July 2004. The plume containment is documented by the absence of detected contaminants in monitoring wells downgradient of the groundwater treatment system. Discontinuation of the pumping was not expected to adversely affect the downgradient water quality based on persistently low TCE levels in these wells and trace (less than 1 ppb) to nondetectable TCE levels in the compliance wells. Statistical analysis confirmed declining contamination trends in the groundwater both on and off the Nutting Site property. On January 27, 1998, the MPCA modified the groundwater sample collection frequency from semi-annual to annual in accordance with the revised monitoring plan.

VI. CURRENT SITE CHARACTERISTICS

Since the shut down of the groundwater pump-and-treat system, natural attenuation has removed residual low-level contaminants in the groundwater. The revised groundwater clean-up standard for TCE of five ppb as outlined in the 2003 RAP has been achieved at the compliance monitoring wells downgradient of the Nutting Site property boundary. The protectiveness of the remedy to human health and the environment has been enhanced by actions taken by the city of Faribault and the MPCA within the past five years. Previously, the city of Faribault had been using one of its production wells located approximately one mile downgradient of the Nutting Site. A grant from the MPCA in 2004 enabled the city to abandon the well.

This action eliminated the possibility for any TCE-contaminated water from the Site to enter the Faribault municipal water supply, thereby removing any potential human health risks due to ingestion of contaminated potable water. No contaminants of concern were ever detected in the compliance monitoring wells downgradient of the Nutting Site. Further, there are no private wells in the area; all potable water is supplied by the Faribault municipal water supply.

Groundwater treatment to meet the RAP standard at the property boundary and the elimination of possible exposure pathways to contaminated groundwater has removed the risk to human health and environment previously associated with TCE-contaminated groundwater from the Nutting Site. The minimal contaminant levels found in the monitoring wells continue to decrease through natural attenuation.

VII. CURRENT AND POTENTIAL FUTURE SITE AND RESOURCE USE

The former Nutting Truck and Caster 8.6-acre Site property is currently occupied and used by the Prairie Avenue Leasing Company. The company leases portions of the property to commercial and light industrial businesses.

Land surrounding the Site consists of mixed low and medium-density residential, commercial, and light industrial use. The current occupants of the property include an active manufacturing facility and warehouse, and an active welding shop. A vacant former foundry building sits in the northeast corner of the property. The downgradient area between the northern Site boundary and Division Street are occupied by two private residences, some office buildings and a self-storage facility. All properties adjacent to and downgradient of the Site are connected to the Faribault municipal drinking water supply. At the present time, there are no known planned land use changes for this Site or any of the surrounding properties.

The MPCA requires the implementation of institutional controls as a prerequisite for delisting a site from the state PLP. An Environmental Covenant and Easement was executed for the Site on October 28, 2008. The covenant provides additional and enforceable protection of public health and the environment as it requires that: 1) no wells can be installed on the property without approval of the MPCA; 2) all monitoring and extraction wells have been properly abandoned as a condition of the Environmental Covenant; 3) the property owner is required to report to the MPCA on an annual basis that conditions at the Site remain consistent with land use prescribed in zoning requirements; and 4) any proposed changes in land use require notification to the MPCA to determine if proposed changes in land use will not affect the protectiveness of the completed remedy.

VIII. CURRENT SITE RISKS

Under both OUs, all appropriate MERLA response actions, which parallel CERCLA response actions, have been completed and long-term monitoring indicates that both the soil and groundwater at the Site do not pose a threat to public health or welfare or the environment.

Because the actions taken at OU1 and OU2 have removed the potential for risks to human health and the environment, these RAs have met U.S. EPA clean-up standards. Accordingly, U.S. EPA recommends that No Further Action be required. The Site conditions allow for unlimited use and unrestricted exposure.

Human Health

Contaminated soils from an on-site disposal pit at the Nutting Site property were excavated and disposed offsite. The disposal pit was filled with clean soil and covered by a concrete parking surface.

Groundwater extraction wells were installed and operated for more than 15 years to control and remove contaminated groundwater. No contaminants of concern were ever detected in the compliance monitoring wells downgradient of the Nutting Site. Long term monitoring since the extraction wells were shut down have shown that groundwater contamination is no longer detected at the compliance monitoring points. All monitoring and extraction wells have been properly abandoned at the Site under MPCA.

Due to the fact that no private wells exist downgradient of the Nutting Site, and that groundwater levels meet the revised RAP standard of five ppb at the Nutting property boundary, all risks to human health associated with TCE-contaminated groundwater from the Nutting Site have been eliminated.

Soil vapor intrusion was not identified as a potential risk at the Site. Soil remediation under OU1 has removed any potential risk through this pathway. The levels of TCE contamination in groundwater were insufficient to pose a soil vapor risk.

Ecological

No ecological risks were ever identified at the Site and would not be expected to occur in the future due to previous remedial actions.

The MPCA determined that the remedy was protective of human health and the environment, and recommended the Site be delisted from the PLP on June 1, 2009. Notice of the proposed delisting from the PLP was published in the State Register to solicit public comments. Copies of the public notices were also sent to parties interested in or affected by the proposed updates. The MPCA did not receive any comments pertaining to the proposed delisting of the Nutting Site from the State Superfund List. The Site was subsequently deleted from the State PLP on September 23, 2009.

Attachment

Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, MN 55155-4194 | 651-296-6300 | 800-657-3864 | 651-282-5332 TTY | www.pca.state.mn.us

August 31, 2010

Mr. Richard Karl
Director, Superfund Division
U.S. Environmental Protection Agency, Region V
77 West Jackson Boulevard
Chicago, IL 60604-3507

RE: Nutting Truck and Caster National Priorties List Site (MND006154017)
Faribault, Rice County, Minnesota

Dear Mr. Karl:

The Minnesota Pollution Control Agency (MPCA) concurs with U.S. Environmental Protection Agency's (EPA) Record of Decision recommendation of no CERCLA remedial action is necessary at the Nutting Truck and Caster National Priorities List (NPL) Site.

As summarized in the MPCA August 12, 2009, letter to the EPA, all appropriate Minnesota Environmental Response and Liability Act response actions have been completed at the Nutting Truck and Caster NPL Site, and that the Site no longer poses a threat to public health (see enclosed). Therefore, the MPCA requests that the Nutting Truck and Caster Site also be deleted from the NPL at EPA's earliest convenience.

The MPCA appreciates EPA's support in addressing the contamination issues at the Site.

If you have any questions about this recommendation, please contact Gary Krueger, of my staff at 651-757-2509.

Sincerely,

Kathryn J. Sather
Division Director
Remediation Division

KJS:csa

Enclosure

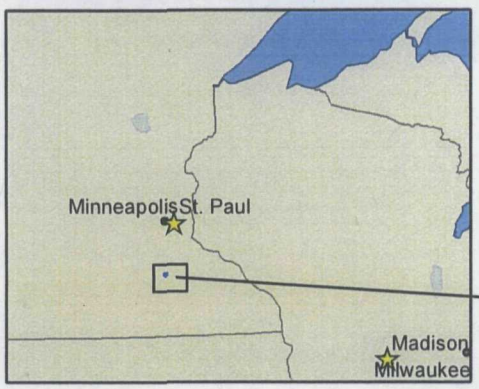
cc: Shelia Sullivan, EPA, Region V (SR-6J)
Stewart Shaft, Prairie Avenue Leasing

Site Location

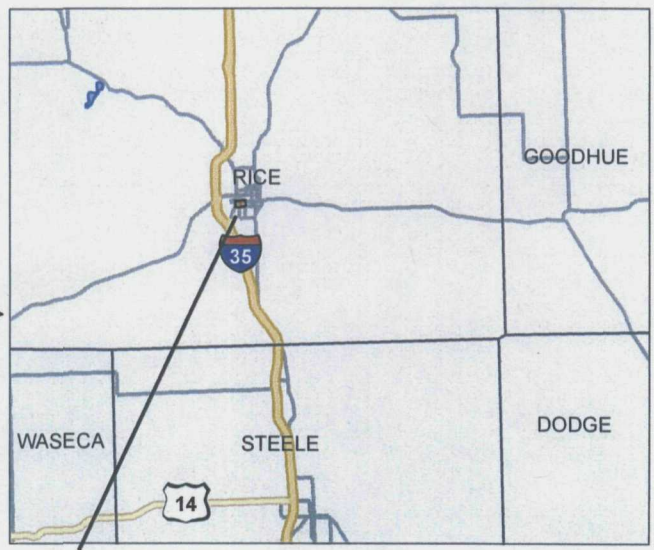
Superfund
U.S. Environmental Protection Agency

Nutting Truck & Caster Co.
Faribault County, Minnesota

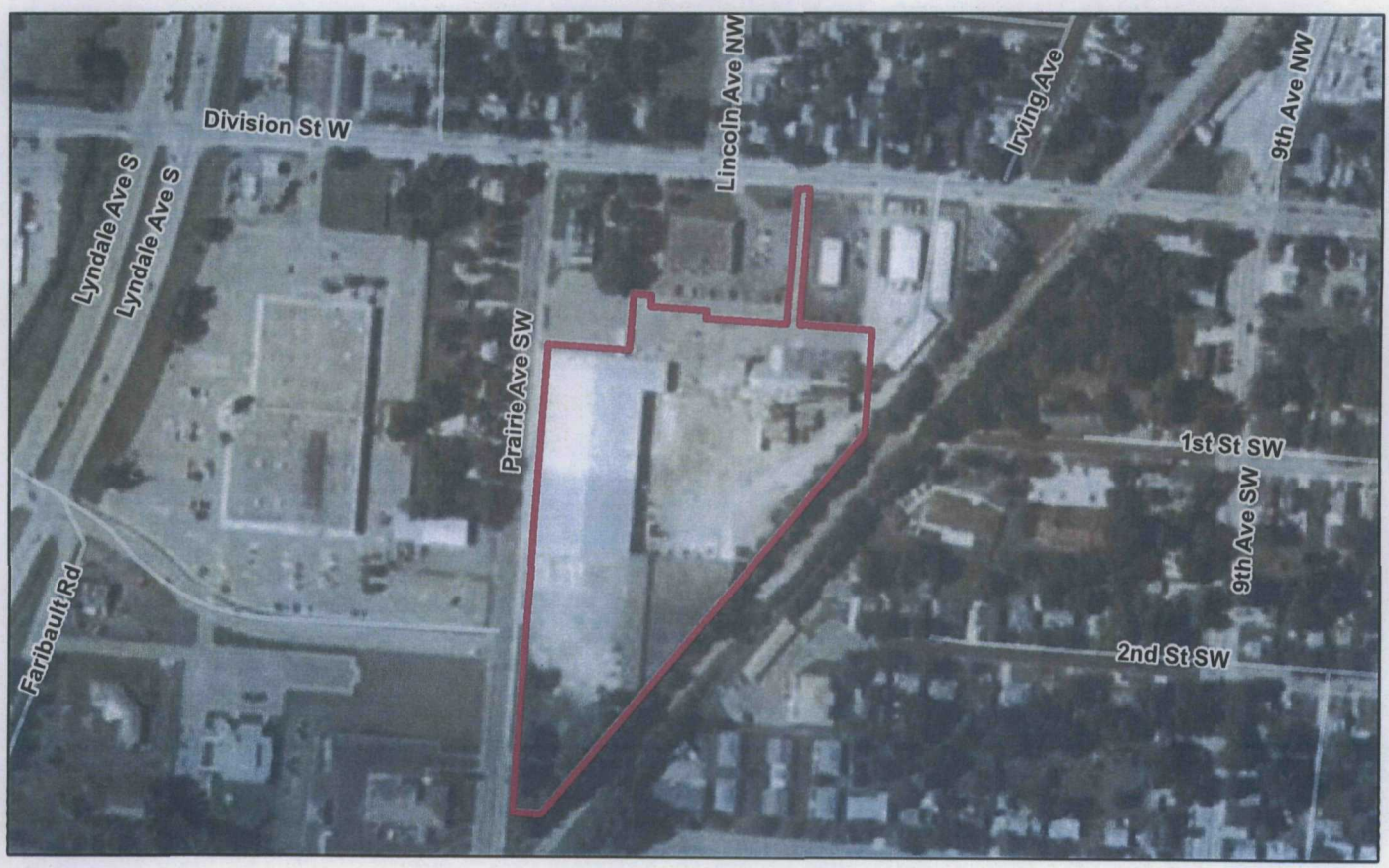
EPA ID# MND006154017



State



County



Site

Figure 1

Produced by Julie Schilf
U.S. EPA Region 5 on May 12, 2008
Image Date: 2003

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GEOS
Groundwater Evaluation and Optimization System

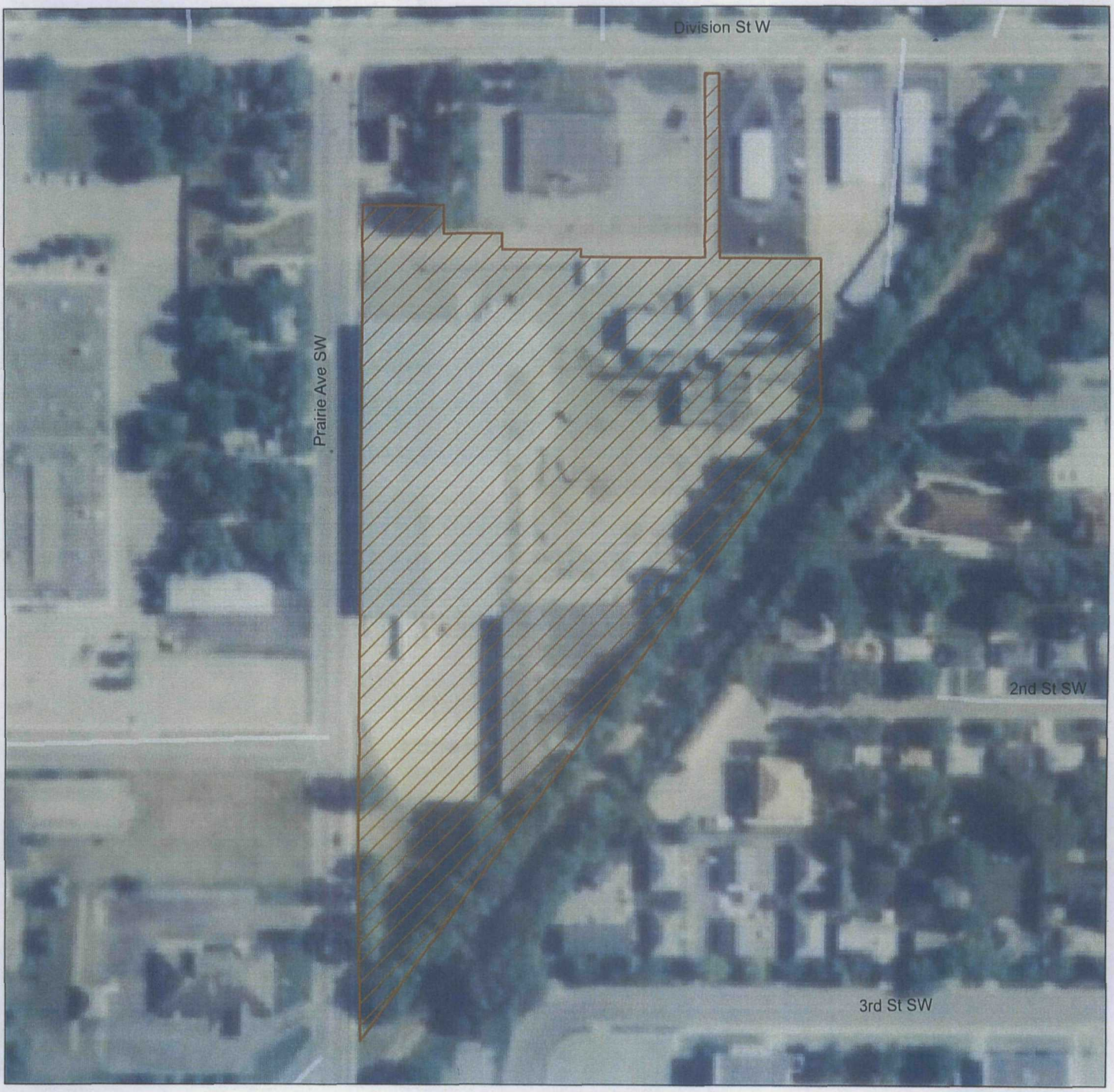
Institutional Control (IC) Review

Implemented Restrictions and Institutional Controls

Superfund
U.S. Environmental Protection Agency

Nutting Truck & Caster Co.
Rice County, MN

EPA ID#MND006154017



Meters
0 12.5 25 50 75 100

N

Legend

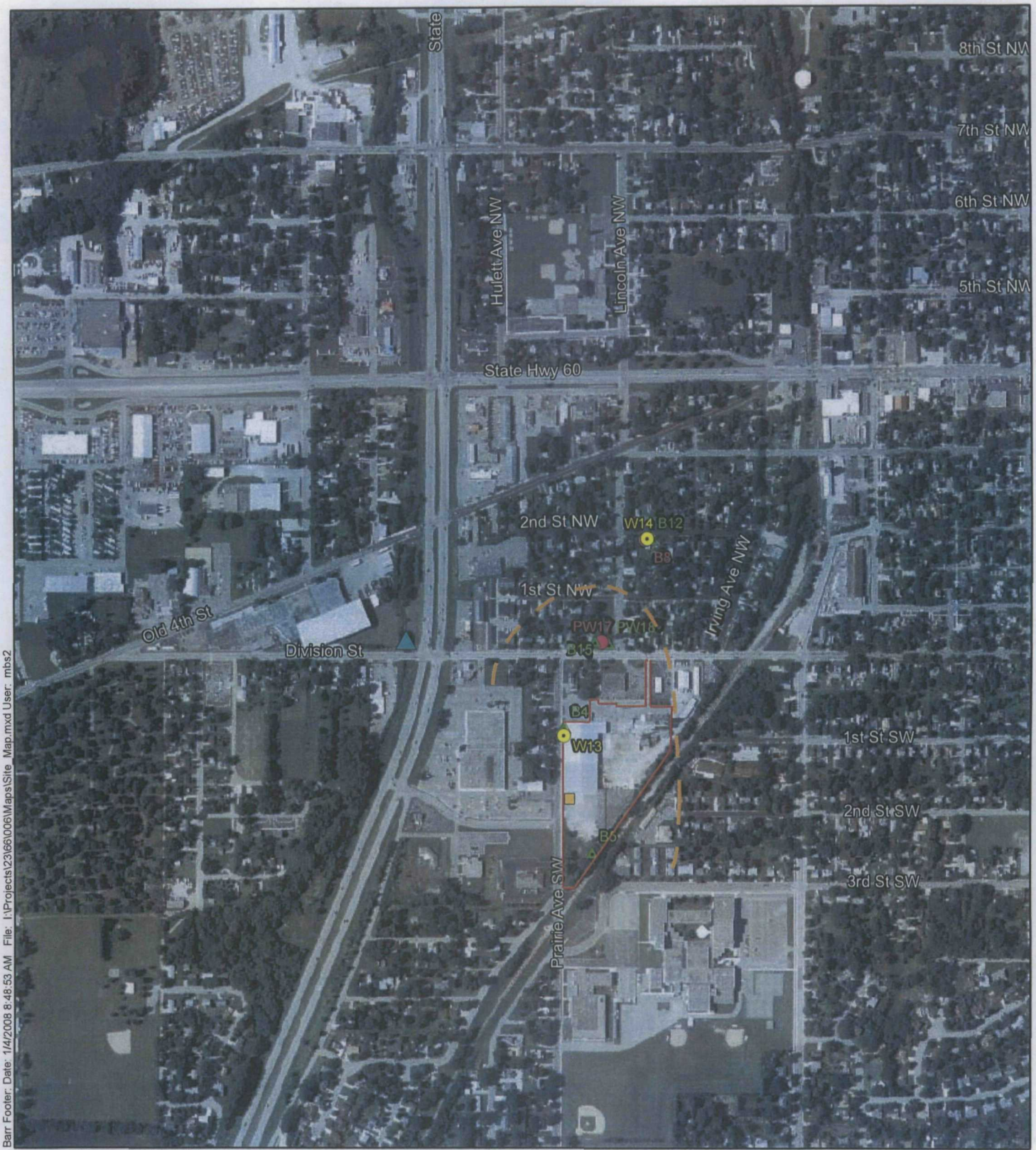
Area with Environmental Covenant and Easement implemented which supports Unrestricted Use and Unresticted Exposure

Produced by Angela Rozinski
U.S. EPA Region 5 on August 19, 2010
Image Date: 2009

Figure 2

EPA Disclaimer: Please be advised that areas depicted in the map have been estimated. The map does not create any rights enforceable by any party. EPA may refine or change this data and map at any time.

GEOS
Groundwater Evaluation and Optimization System



Barr Footer: Date: 1/4/2008 8:48:53 AM File: I:\Projects\23\66\006\Maps\Site_Map.mxd User: mbs2

Imagery Source: 2003 FSA

Crocker's Creek Outfall Monitoring Point

Former Disposal Pit

Nutting Truck Site Outline

Estimated Capture Zone

Aquifer

- Glacial
- Praire du Chien
- St. Peter Sandstone

N

Feet

0 700 1,400

Meters

0 100 200 300 400

Figure 3

SITE MAP
Former Nutting Truck and Caster Co.
(Prairie Ave. Leasing Co.)
Faribault, MN

Glossary

Administrative Record

A file maintained by U.S. EPA that contains all information used by U.S. EPA to make a decision pursuant to its authority under the Superfund law. The Agency makes the administrative record available for public review. For the Nutting Truck and Caster Site, the U.S. EPA Administrative Record is available at U.S. EPA Region 5 office in Chicago and at the MPCA offices in St. Paul, Minnesota.

Capping

A technology to address landfills which contain hazardous wastes. Capping involves placing clean materials over the contamination to isolate it from the surrounding environment. The cap materials are layered and constructed so that the cap is impermeable to rain or snow, thus restricting the contaminants from leaching into the groundwater.

Clean-up or Remedial Action (RA)

Actions taken to deal with a release or threatened release of hazardous substances that could affect public health or the environment. The term is often used broadly to describe various response actions or phases of responses.

Clean-up Levels

A set of clean-up target levels to be attained for specific contaminants when cleaning up a site.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

A federal law passed in 1980 and modified in 1986 by the Superfund Amendments and Reauthorization Act. The Acts, which can be found starting at Section 9601 of Title 42 of the U.S. Code, created a special tax that goes into a Trust Fund, commonly known as Superfund, which may be used to investigate and clean up abandoned or uncontrolled hazardous waste sites. The special tax expired in 1995.

DNAPL (Dense Nonaqueous Phase Liquid)

A DNAPL is one of a group of organic substances that are relatively insoluble in water and denser than water. DNAPLs tend to sink vertically through sand and gravel aquifers to the underlying layer.

Hazard Index

A numerical index used to summarize all of the hazards of chemicals to which an individual may be exposed. A Hazard Index value of 1.0 or less than 1.0 indicates that no adverse human health effects (noncancer) are expected to occur. The index provides a cumulative assessment of potential or adverse health effects from a variety of chemicals having noncancer effects such as liver damage, neurotoxicity, reproductive toxicity, etc.

Health Risk Limits

Under the Groundwater Protection Act of 1989, the Minnesota Department of Health (MDH) protects public health by developing and establishing Health Risk Limits (HRLs) for contaminants in drinking water. The HRL is the concentration of a chemical in drinking water that is likely to pose little or no health risk to humans. MDH develops HRLs using the best science available at the time.

Institutional Controls (ICs)

Non-engineered instruments, such as administrative and/or legal controls, that help minimize the potential for exposure to contamination and protect the integrity of the remedy. There are many different types of ICs that can be used at a site, although the two major types are governmental controls and proprietary controls. Governmental controls are ICs implemented and enforced by a state or local government, such as zoning restrictions, ordinances, statutes, building permits, or other provisions that restrict land or resource use at a site. Local governments have a variety of land use control measures available. Proprietary controls are property use restrictions issued by property owners, such as easements and covenants. These controls involve legal instruments placed in the chain of title of the site or property.

Maximum Contaminant Levels (MCLs)

Under the Safe Drinking Water Act, U.S. EPA sets national standards for contaminants in tap water to ensure consistent quality in public water supplies. Under these standards, MCLs are set for each chemical in order to maintain safe drinking water. MCLs are conservative levels based on the potential for adverse health effects to occur from a life time of exposure to contaminants in drinking water. MCLs also consider the cost and ability to detect and treat these contaminants.

Minnesota Environmental Response, Compensation, and Liability Act (MERLA)

The state counterpart to CERCLA, a State law which may be used to investigate and clean up abandoned or uncontrolled hazardous waste sites. Minn. Stat. § 115B.17 (2008), and Minn. R. ch. 7044 (2006).

Natural Attenuation

Natural attenuation is a variety of physical, chemical and biological processes that, under certain favorable conditions, can occur naturally to reduce the toxicity, mobility, volume or concentration of chemicals in groundwater. Under the correct conditions, Natural Attenuation can facilitate the cleanup of groundwater.

Minnesota Pollution Control Agency (MPCA)

The State pollution control agency authorized to carry out the state Superfund program.

National Priorities List (NPL)

A federal roster of uncontrolled, contamination sites that actually or potentially threaten human health or the environment and are eligible for extensive, long-term investigation and cleanup under the Federal Superfund program.

Permanent List of Priorities (PLP)

The Minnesota State roster of uncontrolled, contaminated sites that actually or potentially threaten human health or the environment and are eligible for extensive, long-term investigation and cleanup under the State Superfund program. Under MERLA, the MPCA can propose the listing of such sites to the State Superfund Priority List, also known as the Permanent List of Priorities.

Potentially Responsible Party (PRP)

Parties that have been found to be potentially legally responsible for contamination and/or cleanup at a site. Under Superfund, PRPs can include entities (persons or companies) that are owners or operators of Superfund designated sites or those who arranged for disposal of hazardous substances at a Superfund site or transported hazardous substances to a Superfund site.

Parts-Per-Billion (ppb)

A unit used to quantify the amount of a contaminant in the environment. The unit is commonly used to show the concentration level of a contaminant in water, soil, and sediment. In the case of water, one part-per-billion is equivalent to one microgram-per-liter (ug/L). For example, to express the concentration of benzene in water, one ppb of benzene is interpreted as one part of benzene for every billion parts of water. This can also be expressed as one microgram of benzene for every liter of water.

Parts-Per-Million (ppm)

A unit used to quantify the amount of a contaminant in the environment. The unit is commonly used to show the concentration level of a contaminant in water, soil, and sediment. In the case of soil, one part-per-million is equivalent to one milligram-per-kilogram (mg/kg).

Principal Threat

Principal threat wastes are those source materials considered to be highly toxic or highly mobile which generally cannot be contained in a reliable manner or would present a significant risk to human health or the environment should exposure occur. Identifying principal threat wastes combines concepts of both hazard and risk. The NCP establishes an expectation that U.S. EPA will use treatment to address the principal threats posed by a site wherever practicable (NCP §300.430(a)(1)(iii)(A)).

Proposed Plan

A document that describes the clean-up alternatives evaluated for a Superfund site and identifies the Preferred Alternative and the rationale for the preference. A public comment period and opportunity for a public hearing takes place after release of the Proposed Plan and before the Record of Decision.

Recommended Allowable Limits (RALs)

The earliest type of guidance available was the "Drinking Water Recommended Allowable Limits" or "RALs." These were based solely on the risk of potential health effects. RALs were primarily developed for private water supplies, but were also used for public water supplies in the absence of applicable federal standards.

Record of Decision (ROD)

A legal document signed by U.S. EPA that describes the final clean-up remedy for a Superfund site, why the remedial action was chosen, how much it will cost, and the public comments on the remedial action.

Remedial Investigation/Feasibility Study (RI/FS)

A two-part study of the site. The first part is the Remedial Investigation (RI), which studies the nature and extent of the problem. The second part is the Feasibility Study (FS), which evaluates different methods of dealing with the problem and recommends a method that will effectively protect public health and the environment.

Request for Response Action (RFRA)

A formal MPCA Citizens Board request to responsible parties at State Superfund sites asking them to take specific actions at the site leading to cleanup. The RFRA describes a series of response actions to be taken at the site. These response actions are intended to prevent, minimize, mitigate

or eliminate releases of hazardous substances from the site into the environment. Therefore these response actions are reasonable and necessary to protect the public health, welfare, and the environment.

Response Action Plan (RAP)

A response action plan specifies the methods and schedules for remedial action at Minnesota state superfund sites (i.e., sites listed on the PLP). This document is similar to a statement of work specifying the methods and schedules for a selected remedial action at U.S. EPA superfund sites (i.e., sites listed on the NPL).

Response Order

A legal order under the authority of the State Superfund law between the MPCA and potentially responsible parties (PRPs). Under the agreement, the PRPs agree to perform or pay the cost of clean-up actions to be taken at the site. The clean-up actions can include performing a remedial investigation or response action.

Risk Assessment

A study conducted as part of the Remedial Investigation to determine the threats posed to human health and the environment if the site's contamination is left unaddressed. The study takes into account such factors as the contaminant's toxicity and the paths and likelihoods of exposure.

Superfund

The common name for the cleanup fund created by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and MERCLA. It is often also used to refer to the cleanup process under CERCLA and MERCLA.

Volatile Organic Compounds (VOCs)

Compounds composed primarily of carbon, oxygen, and hydrogen characterized by their tendency to evaporate easily and quickly. Examples of VOCs include: trichloroethylene (TCE), 1,1-dichloroethylene, methylene chloride, benzene, and vinyl chloride which may be. These chemicals commonly exist in such liquids as dry cleaning fluid, metal degreasers, lighter fluid, paint thinners, and components of gasoline.

U.S. ENVIRONMENTAL PROTECTION AGENCY

ADMINISTRATIVE RECORD
FOR
NUTTING TRUCK AND CASTER SITE
FARIBAULT, MINNESOTA

ORIGINAL
SEPTEMBER 1, 2010
(SDMS ID: 370784)

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	04/24/84	MPCA	File	Request for Approval of a Consent Order with The Nutting Company for the Purpose of Conducting a Remedial Investigation and Possibly a Remedial Action Feasibility Study at and Near the Nutting Facility in Faribault **(SDMS ID: (370795)**	
2	04/26/84	MPCA	Respondent	Response Order by Consent for the Nutting Company **(SDMS ID: 209062)**	40
3	08/11/86	Barr Engineering Company	MPCA	Remedial Investigation for the Nutting Company Faribault Property **(SDMS ID: 370796)**	
4	09/01/86	Barr Engineering Company	Nutting Truck and Caster	Specifications for Pump-Out Well Installation **(SDMS ID: 370797)**	
5	10/15/86	Kalitowski, T., MPCA	Comstock, B., Dorsey & Whitney	Letter re: MPCA Review of the Remedial Investigation for the Nutting Site w/ Attachments **(SDMS ID: 370798)**	
6	02/06/87	Barr Engineering Company	MPCA	Response Action Plan for the Nutting Company Faribault Site **(SDMS ID: 370753)**	57
7	03/24/87	MPCA	File	Request for Issuance of a Request for Response Action to the Nutting Company Regarding Ground Water Contamination At and Around the Nutting Truck and Caster Hazardous Waste Site in Faribault w/ Attachments **(SDMS ID: 370799)**	

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
8	09/22/87	MPCA	File	Request for Approval of a Response Order by Consent Between the MPCA and the Nutting Company Regarding Ground Water Contamination Associated with the Nutting Truck and Caster Hazardous Waste Site in Faribault **(SDMS ID: 370800)**	
9	09/24/92	U.S. EPA	File	Superfund Preliminary Site Close Out Report for the Nutting Company Site **(SDMS ID: 370755)**	4
10	03/29/94	U.S. EPA	File	Five-Year Review Report for the Nutting Truck and Caster Site **(SDMS ID: 158637)**	14
11	10/01/94	U.S. EPA/ MPCA	File	MPCA Enforcement Deferral Pilot Project **(SDMS ID: 373273)**	2
12	05/03/95	U.S. EPA/ OERR	U.S. EPA	Memorandum re: Transmittal of the "Guidance on Deferral of NPL Listing Determinations While States Oversee Response Actions (OSWER Directive 9375.6-11) **(SDMS ID: 373272**	36
13	03/31/98	MPCA	File	Five-Year Review Report for the Nutting Truck and Caster Site **(SDMS ID: 158992)**	18
14	06/02/00	U.S. Public Health Service/ ATSDR	File	Health Consultation for the Nutting Truck and Caster Company Site **(SDMS ID: 370756)**	23
15	05/16/03	U.S. EPA	File	Third Five-Year Review Report for the Nutting Truck and Caster Site **(SDMS ID: 176739)**	25
16	07/25/03	Barr Engineering Company	File	Final Close Out Report for the Former Nutting Truck and Caster Company Site **(SDMS ID: 370749)**	40

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
17	05/15/08	U.S. EPA/ MPCA	File	Fourth Five-Year Review Report for the Nutting Truck and Caster Site **(SDMS ID: 298336)**	136
18	03/11/09	Krueger, G., MPCA	Sullivan, S., U.S. EPA	Letter Forwarding Attached Environmental Covenant and Easement for the Nutting Truck and Caster Site **(SDMS ID: 370751)**	57
19	06/01/09	Sather, K., MPCA	Addressees	Letter re: Notice of Proposed Update to State Superfund Priority List Deleting the Nutting Truck and Caster Site **(SDMS ID: 370757)**	3
20	08/11/09	Sather, K., MPCA	Shaft, S., Prairie Avenue Leasing, Ltd.	Letter re: MPCA Approval of Delisting of the Nutting Truck and Caster Site from Minnesota's Permanent List of Priorities **(SDMS ID: 370750)**	15
21	09/12/09	Sather, K., MPCA	Karl, R., U.S. EPA	Letter re: Termination of the Response Order by Consent Between MPCA and Nutting **(SDMS ID: 370754)**	2
22	03/12/10	Sather, K., MPCA	Karl, R., U.S. EPA	Letter re: MPCA Concurrence with U.S. EPA Recommendation to Delete the Nutting Track and Caster Site from the National Priorities List w/ Attachment **(SDMS ID: 370752)**	3
23	07/00/10	U.S. EPA	Public	Fact Sheet: EPA Satisfied with Previous Cleanup Actions at the Nutting Truck and Caster Site **(SDMS ID: 370758)**	4
24	07/00/10	U.S. EPA	Public	Proposed Plan for the Nutting Truck and Caster Site **(SDMS ID: 370766)**	16

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
25	08/31/10	Sather, K., MPCA	Karl, R., U.S. EPA	Letter re: MPCA Concurrence with U.S. EPA's Record of Decision Recommendation of No CERCLA Remedial Action at the Nutting Truck and Caster Site **(SDMS ID: 373305)**	1